

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff

v.

\$10,021.00 IN U.S. CURRENCY,

Defendant.

CIVIL NO. 20-

VERIFIED COMPLAINT FOR FORFEITURE IN REM

TO THE HONORABLE COURT:

COMES NOW, plaintiff, the United States of America, by and through its undersigned attorneys, W. Stephen Muldrow, United States Attorney for the District of Puerto Rico; Héctor E. Ramírez-Carbó, Assistant United States Attorney, Chief Civil Division, and Maritza González-Rivera, Assistant U.S. Attorney, brings this complaint and alleges as follows in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure.

NATURE OF THE ACTION

1. This is a civil action in rem brought to enforce the provisions of Title 21, United States Code, Sections 841(a)(1) and 881(a)(6); and Title 18 United States Code, Sections 1956(a)(1) (B)(i) and 1957(a).

DEFENDANT IN REM

2. The defendant currency seized by an officer of the Drug Enforcement Administration (“DEA”) consists of \$10,021.00 in U.S. currency.

JURISDICTION AND VENUE

3. This Court has subject matter jurisdiction over an action commenced by the United States

pursuant to Title 28 United States Code, Section 1345; over an action for forfeiture pursuant to Title 28, United States Code, Section 1355; and over this particular action pursuant to Title 21, United States Code, Sections 841(a)(1) and 881(a)(6); and Title 18 United States Code, Sections 1956(a)(1) (B)(i) and 1957(a).

4. This Court has in rem jurisdiction over the defendant currency pursuant to Title 28, United States Code, Section 1355(b)(1)(A) (acts and omissions giving rise to the forfeiture occurred in this district) and Section 1355(b)(1)(B) (the defendant currency is found in this district).
5. Venue is proper in this district pursuant to Title 28, United States Code, Section 1355(b)(1)(A) (acts and omissions giving rise to the forfeiture occurred in this district) and Section 1395 (the defendant currency is found in this district).

BASIS FOR FORFEITURE

6. This is a civil action in rem brought to enforce the provisions of Title 21, United States Code, Section 841(a) (1) (Unlawful acts) and 881(a)(6)(All moneys, negotiable, instruments, securities, or other things of value furnished or intended to be furnished by any person in exchange for a controlled substance or listed chemical in violation of this subchapter, all proceeds traceable to such an exchange, and all moneys, negotiable instruments, and securities used or intended to be used to facilitate any violation of this chapter; and Title 18, United States Code, Sections 1956(a)(1) (Laundering of monetary instruments) and 1957(a) (Engaging in monetary transactions in property derived from special unlawful activity)..

FACTS

7. The facts and circumstances supporting the seizure and forfeiture of the defendant currency are contained in the Title 28, United States Code, Section 1746 unsworn declaration of the

DEA, Task Force Officer, Olga Tapia-Nieves attached hereto, and incorporated herein as if fully stated.

CLAIM FOR RELIEF

WHEREFORE, the United States of America prays that a warrant of arrest for the defendant currency be issued; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that judgment be entered declaring the defendant currency condemned and forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other and further relief as this Court may deem just and proper, together with the costs and disbursements of this action.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, this 17th day of March 2020.

W. STEPHEN MULDROW
United States Attorney

s/Héctor E. Ramírez-Carbó
Héctor E. Ramírez-Carbó
Assistant U.S. Attorney
Chief, Civil Division
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Maritza González-Rivera
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Phone Number: (787) 766-5656
maritza.gonzalez@usdoj.gov

VERIFIED DECLARATION

I, Maritza González-Rivera, Assistant U.S. Attorney, for the District of Puerto Rico, declare under penalty of perjury as provided by Title 28, United States Code, Section 1746, the following:

That the foregoing Complaint is based on reports and information furnished to me by the Drug Enforcement Administration ("DEA"); that everything contained therein is true and correct to the best of my knowledge and belief.

Executed in San Juan, Puerto Rico, this 17th day of March 2020.



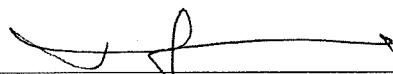
Maritza González-Rivera
Assistant U.S. Attorney

VERIFIED DECLARATION

I, Olga Tapia-Nieves, Task Force Officer, DEA declare as provided by Title 28, United States Code, Section 1746, the following:

I have read the contents of the foregoing Complaint for Forfeiture in Rem and the attached unsworn declaration thereto, and I find the same to be true and correct to the best of my knowledge and belief. I declare under penalty of perjury that the foregoing is true and correct.

Executed in San Juan, Puerto Rico, this 17th day of March 2020.



Olga Tapia-Nieves, Task Force Officer
Drug Enforcement Administration ("DEA")

UNSWORN DECLARATION
IN SUPPORT OF FORFEITURE COMPLAINT

INTRODUCTION

Pursuant to Title 28, United States Code, Section 1746, I, Olga Tapia-Nieves, Task Force Officer, of the United States Department of Justice, Drug Enforcement Administration, declare under penalty of perjury that the foregoing is true and correct:

I am an investigative or law enforcement deputized Task Force of the United States within the meaning of Title 18, United States Code, Section 2510 (7). I am, therefore, an officer who is empowered to conduct criminal investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section, 2516.

I have been a Puerto Rico Police Department Agent for 15 years and Task Force Officer with the Drug Enforcement Administration; since 2011. As a Task Force Officer, I have been sworn to enforce the laws of Title 21, United States Code, and related offenses under Title 18, United States Code. I have received training and has participated in criminal investigations relating to large-scale drug trafficking organizations. I am currently assigned to the DEA Caribbean Division (Enforcement Group I) in San Juan, Puerto Rico.

During my law enforcement career, I have received detailed instruction in and conducted various complex conspiratorial investigations concerning the trafficking of illegal drugs and its proceeds, unlawful importation and distribution of controlled substances; the laundering and concealment of drug proceeds; and the illegal use of communication facilities by drug traffickers in furtherance of their criminal activities.

BASIS FOR FACTS CONTAINED IN THIS UNSWORN DECLARATION

I make this unsworn declaration, on information and belief derived from the following source:

- A. Oral and/or written reports and documents about this and other federal agents or officers of Puerto Rico Police Department.

1. October 1, 2019, at approximately 9:00am, Puerto Rico Police Bureau (PRPB) San Juan Motorized Unit (SJMU) agent Ruben Collazo, badge #18554 and Martinez Natal #35562 were conducting surveillance near to Roosevelt and San Rafael streets in Figueroa's ward located in San Juan, in support of an ongoing investigation.
2. During the surveillance at a known drug point, PRPB Agents observed when an unidentified male arrive at the drug point area in a Red KIA Soul PR bearing plate # IWG-822 and walk to the drug point. The agents observed that the vehicle arrived and parked at San Rafael Street. The agents observed a male, later identified as Hector HERNANDEZ-Sanchez, walk towards Blanca Street to the drug point; HERNANDEZ-Sanchez looked nervous, walking quickly and constantly looking around the area which seemed suspicious to the agents. According to the agents experience of the Drug Trafficking Organizations (DTO) Investigations, DTO members commonly behave in the manner which HERNANDEZ-Sanchez was observed when they are the "runner", that is, the person in the DTO who delivers the packages of drugs to be sold at the drug point, and/or who picks up the earnings of the drug sales, to be delivered to the owners of the drug sold.
3. The PRPB agents observed when HERNANDEZ-Sanchez arrived to the drug point and approached an individual who appeared to be, based on their training and experience, the drug seller.
4. PRPB agents observed when HERNANDEZ-Sanchez, met with the suspected drug seller. Moments later, PRPB agents arrested Hector HERNANDEZ-Sanchez and Kenneth Johans Jose LEONARD-Soto because they had probable cause to believe that they were conducting a drug sale transaction in their presence.
5. LEONARD-Soto was later charged at local jurisdiction for violations of drug laws for possession with intent to distribute three (3) bags with cocaine. HERNANDEZ-Sanchez and LEONARD-Soto were advised of their Miranda rights and later both signed the Miranda Rights document.
6. During the arrest, HERNANDEZ-Sanchez voluntarily stated to the agents that his vehicle was parked near to the area. HERNANDEZ-Sanchez stated that he was in the drug point to buy "Perico" which is the name commonly known in the streets to identify the illegal narcotic drug cocaine.
7. Immediately, PRPB agents requested the presence of a K-9 to verify the vehicle. PRPB Agent Gloria Sanchez #24337 and PRPB K-9 "Tango" # 33901 arrived to the area and conducted an open-air sniff of the vehicle Red KIA Soul plate IWG-822, which alerted positive to odor of control substances.
8. HERNANDEZ-Sanchez stated to the agents, that he is a user of cocaine and that in his vehicle KIA Soul he had approximately \$10,000.00 in US Currency, allegedly to be transfered to "El Comandante" Horse Racing Office located in Canovanas. HERNANDEZ-Sanchez consented to the search of the vehicle Kia Soul and signed the Consent to search form. During the search of the vehicle, PRPB agents seized a large amount of US Currency concealed inside a black box inside a plastic bag. The US Currency as document on a Deposit Slip 20-DEA- 656530 for \$10,021.00 in USC, after the official count.
9. The US Currency was verified by the PRPB K9 "Tango" which alerted positive to odor of control substances.

10. HERNANDEZ-Sanchez was transported to PRPB San Juan Office to be interviewed. HERNANDEZ-Sanchez agreed to be interviewed by DEA/E-1 group agents.
11. At the beginning of the interview, HERNANDEZ-Sanchez did not explain the reason why he was in Figueroa's ward located in Santurce, PR, at the moment of the arrest. Later HERNANDEZ-Sanchez stated to the agents that he is a cocaine user and he stay in Figueroa's Ward to buy drugs. After this, HERNANDEZ-Sanchez stated to the agents that he deposited US Currency every week in Camareno Horse Racing Stables, but he did not know the address that will be used to make the deposit of the US Currency. HERNANDEZ-Sanchez stated to the agents that the US Currency was to be transferred to "El Comandante" Horse Racing office for payment of slot machines from a local store "Pacho Liquor store" located in Sierra Linda #14, Bayamon, PR. According to HERNANDEZ-Sanchez, he works for Francisco Javier BELTRAN-Falcon who allegedly is the owner of the vehicle KIA Soul and of "Pacho Liquor store". HERNANDEZ-Sanchez stated to the agents that the US Currency was not his property and that he was following instructions imparted to him by BELTRAN-Falcon.
12. DEA Agents asked to HERNANDEZ-Sanchez if he had evidence, such as a document, bank slip or any receipt for the alleged payment and HERNANDEZ-Sanchez indicated that he did not have any documents, nor could he produce them.
13. Later, Francisco Javier BELTRAN-Falcon arrived to PRPB office, and asked to speak with the PRPD agents, to inquire about HERNANDEZ-Sanchez's case. BELTRAN-Falcon identified himself to the agents as the owner of the vehicle KIA Soul and the US Currency that was seized from HERNANDEZ-Sanchez.
14. DEA/TFO Juan Ruiz, as witnessed by the Undersigned TFO Olga Tapia, interviewed BELTRAN-Falcon. During the interview, BELTRAN-Falcon stated that he is the owner of "Pacho Liquor Store" and that the US Currency was earnings of the liquor store sales. BELTRAN-Falcon stated that the US Currency was earning for Slots machines that he has in the liquor store and later told that the US Currency was to be deposit in Camareno Horse Racing Stables office for the slots machines. DEA agents asked to BELTRAN-Falcon of the documents that prove the alleged payment or the account number for the deposit of the US Currency to Camareno Horse Racing Stables but he did not produce it. BELTRAN-Falcon told that he did not have any documents related the Currence deposit and he could not provide them. DEA agents asked to BELTRAN-Falcon if he made deposits of US Currency to Camareno Horse Racing Stables weekly and BELTRAN-Falcon say no. However, HERNANDEZ-Sanchez had previously stated that he made deposits every week as instructed by BELTRAN-Falcon.
15. During the interview, BELTRAN-Falcon and HERNANDEZ-Sanchez were nervous and inconstant in their versions. HERNANDEZ-Sanchez and BELTRAN-Falcon did not establish credible consistent facts to support the origin of the US Currency. During the interview, BELTRAN-Falcon stated to the agents that allegedly the US Currency was obtained from slot machines bets, but the denominations of the bills that were seized during the PRPB intervention were mostly of \$100.00, \$20.00 bills.

16. The Following is to described the denominations of the US Currency that was seized from HERNANDEZ-Sanchez:

DENOMINATIONS


13	X	\$100.00	=	\$1,300.00
2	X	\$50.00	=	\$100.00
411	X	\$20.00	=	\$8,220.00
16	X	\$5.00	=	\$80.00
66	X	\$1.00	=	\$66.00
Coin			=	\$255.00
TOTAL				\$10,021.00.

17. The US Currency were not consistent with the common denominations in that type of slots machines. The slots machines commonly use bills of denominations \$1.00, \$5.00 and \$10.00, not of \$20.00 or \$100.00 bills.
18. According to the investigation Beltran-Falcon did not have any documentation to prove that the US Currency seized by DEA agents was for a deposit of the proceeds of slots machines from Camareno Horse Racing Stables which was the reason that he claimed at moment of the seizure.
19. BELTRAN-Falcon and HERNANDEZ-Sanchez were not consistent in their versions. BELTRAN-Falcon stated to the agents that the US Currency was his earnings in the liquor store but according to the investigation he is not registered as the owner of "Pacho Liquor Store"/

This Unsworn Declaration is submitted in support of an Administrative Forfeiture, which involves the offenses detailed in Section 881(a)(6) of Title 21, United States Code, particularly the all moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished by any person in exchange for controlled substance or listed chemical in violation of the subchapter, all proceeds traceable to such an exchange, and all moneys, negotiable instruments, and securities used or intended to be used to facilitate any violation of this subchapter. Therefore, I have not set forth each and every fact learned during the course of this investigation.

Based upon my training and experience, participation in other investigations, and facts concerning this investigation, I believe that sufficient probable cause exists to show that there is present material evidence of a commission of a violation of a Federal Law

to wit: drug traffickers in utilizing a mail/parcel service to smuggle or transport illicit drug proceeds demonstrates probable cause to Forfeit the U.S. Currency, violations of Title 21, United States Code, Sections 841(a)(1) , 881(a)(6) and money laundering schemes, Title 18, United States Code, Sections 1956 (a) (1) (B)(i) and 1957 (a). Sworn and signed under penalty of perjury, pursuant to Title 28, United States Code, Section 1746, in San Juan, Puerto Rico this 11 of March 2020.

A handwritten signature in black ink, appearing to read 'Olga Tapia-Nieves', is written over a horizontal line.

Olga Tapia-Nieves

Task Force Officer
Drug Enforcement Administration (DEA)
Caribbean Division

JS 44 (Rev. 11/04)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

UNITED STATES OF AMERICA

(b) County of Residence of First Listed Plaintiff _____
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

Maritza González-Rivera, AUSA, 350 Carlos Chardón Ave, Suite
1201, Hato Rey, PR 00918

DEFENDANTS

\$10,020.00 IN U. S. CURRENCY,

Co

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE
LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | | | | | |
|---|---------------------------------------|----------------------------|---|----------------------------|----------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input checked="" type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition		

V. ORIGIN

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Title 21, United States Code, Sections 841(a)(1) and 881(a)(6); and
Title 18 United States Code, Sections 1956(a)(1) (B)(i) and 1957(a).

VII. REQUESTED IN COMPLAINT:

UNDER F.R.C.P. 23

Only if demanded in complaint:

JURY DEMAND: ☐ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE _____

DOCKET NUMBER _____

DATE

March 17, 2020

SIGNATURE OF ATTORNEY OF RECORD

S/Maritza González-Rivera

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____


United States District Court *for the* District of Puerto Rico
CATEGORY SHEET

1. Title of Case (Name of first party on each side only)

US v. \$10,021.00 IN U.S. CURRENCY,

2. Category in which case belongs: (See Local Rules)

☒ X

ORDINARY CIVIL CASE
SOCIAL SECURITY
BANK CASE
INJUNCTION

CIVIL FORFEITURE

3. Title and number, if any, of related cases (See Local Rules)

4. Has a prior action between the same parties and based on the same claim ever been filed in this Court?

☐ YES

☒ X

NO

5. Is this case required to be heard and determined by a District Court of three judges pursuant to Rule 28 U.S.C. 2284?

☐ YES

☒ X

NO

6. Does this case question the constitutionality of a state statute (FRCP 24)?

☐ YES

☒ X

NO

(Please Print)

USDC ATTORNEY'S ID NO.

208801

ATTORNEY'S NAME:

MARITZA GONZALEZ RIVERA

MAILING ADDRESS:

TORRE CHARDON, SUITE 1201, 350 CARLOS CHARDON AVE

HATO REY PR

ZIP CODE

00918

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787-766-5656